IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF TEXAS AUSTIN DIVISION

IN RE:

HOWARD LEE WORTHING ' Case No. 21-10877

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Debtor Chapter 7

DEBTOR'S MOTION FOR EXTENSION OF TIME TO FILE SCHEDULES, STATEMENTS AND OTHER DOCUMENTS UNDER FED. R. BANKR. P. 1007

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, Howard Lee Worthing (Debtor) in the above-styled case, and files his Motion for Extension of Time to File Schedules, Statements and Other Documents Under Fed. R. Bankr. P. 1007 and would respectfully show the Court as follows:

- 1. This bankruptcy case was filed on an emergency basis on November 16, 2021, in order to prevent further collection efforts by judgment creditor. Pursuant to Fed. R. Bankr. P. 1007, the Debtor is required to file his Schedules, Statements and Other Documents, herein on or before November 30, 2021.
- 2. Debtor would show that since the date he filed bankruptcy he has been diligently working on completing and filing the above-referenced documents. However, since the date of the filing of this bankruptcy case, Debtor's attorney has been unable to complete Debtor's Schedules, Statements and Other Documents, due to needing further information from the Debtor and time lost due to the Thanksgiving holiday. However, Debtor and his attorney believe that they will be able to complete and file such documents by December 10, 2021.
 - 3. Due to the facts set forth above, Debtor believes that good cause exists for such extension.
 - 4. This extension of time will not prejudice any Creditor of the Debtor.

WHEREFORE, Debtor respectfully requests that Debtor be granted an extension of time to file Debtor's Schedules, Statements and Other Documents required by Fed. R. Bankr. P. 1007 until and including December 10, 2021.

RESPECTFULLY SUBMITTED, THE BROWN LAW FIRM

By: /s/ Jerome A. Brown
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Attorney for Debtor

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was forwarded via First Class U.S. Mail, postage prepaid, or by electronic mail from the Clerk of the Court on November 30, 2021 to the following parties-in-interest entitled to notice set forth below:

Chapter 7 Standing Trustee Randolph N. Osherow 342 W/ Woodlawn, Suite 100 San Antonio, TX 78212 210-738-3001

US Trustee Office of the US Trustee 515 Rusk Ave Ste 3516 Houston, TX 77002 713-718-4650

Howard Worthing 114 The Hills Rd. Horseshoe Bay, TX 78657

By: <u>/s/ Jerome A. Brown</u>
Jerome A. Brown